

SBDE NO. 2019-00867

**IN THE MATTER OF
THE REGISTRATION OF**

**MOBILE DYNAMIC DENTAL
SERVICES**

**TEXAS MOBILE DENTAL FACILITY
REGISTRATION NUMBER M-24456**

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BEFORE THE STATE

BOARD OF

DENTAL EXAMINERS

VOLUNTARY SURRENDER ORDER

Mobile Dynamic Dental Services, by and through its owner, Stacey Bartley, RDA, hereinafter "Respondent," holder of Texas Mobile Dental Facility Registration No. M-24456, voluntarily surrenders Texas Mobile Dental Facility Registration No. M-24456. Respondent, by signature below, acknowledges that Respondent was advised of the right to legal representation, and that Respondent understands the nature of the alleged violations. Respondent's signature hereon also acknowledges that an adequate opportunity was provided to allow Respondent to respond to the alleged violations.

FINDINGS OF FACT

1. Respondent, Mobile Dynamic Dental Services, by and through its owner, Stacey Bartley, RDA, holds Texas Mobile Dental Facility Registration No. M-24456. Respondent's registration was initially issued on December 31, 2014, and was in full force and effect at all dates and times material and relevant to this Voluntary Surrender Order.
2. Respondent holds a Mobile Dental Facility Registration in the State of Texas.
3. On or about November 28, 2018, through the present, Respondent engaged in dishonorable conduct. Specifically, Respondent:
 - a. obtained a permit through fraud or misrepresentation by attesting that Mobile Dynamic Dental Services, a mobile dental facility, was in complete compliance with Board rules regarding the operation of a mobile dental facility or portable unit in Texas while submitting a mobile dental unit permit renewal application; and
 - b. practiced dentistry without a license by owning, maintaining, and operating a mobile dental facility and employing licensees to practice dentistry.

CONCLUSIONS OF LAW

The references to Statutes and Rules cited below are to the Statutes and Rules in effect at the time of the violations.

1. The Texas State Board of Dental Examiners has authority and jurisdiction over this case pursuant to Tex. Occ. Code § 251.001 et seq. and 22 Tex. Admin. Code § 101 et seq.
2. The conduct described above constitutes a violation of Tex. Occ. Code §§ 251.003(a)(4), 263.002(a)(3), (6), (10); and 22 Tex. Admin. Code §§ 108.43(a), (b)(5), 114.10(3), (5), (8).

ORDER

IT IS THEREFORE ORDERED THAT:

1. The voluntary SURRENDER of Respondent's Texas Mobile Dental Facility Registration No. M-24456 issued to Mobile Dental Dynamic Services, is hereby ACCEPTED. Respondent's Affidavit of Registration Surrender is attached hereto as Exhibit "A."
2. Respondent's voluntary registration surrender shall resolve SBDE Case No. 2019-00867. The surrender of Registration No. 2019-00867 shall be effective immediately.
3. Respondent shall cease operating a Mobile Dental Facility in all respects in the State of Texas immediately.
4. Respondent shall take all appropriate measures to effect the surrender of any and all permits, schedules, rights and privileges held by virtue of Texas Mobile Dental Facility Registration No. M-24456 no later than the effective date of registration surrender.

By signing this Surrender Order, Respondent agrees to its terms, acknowledges understanding it, and agrees that Respondent will satisfactorily comply with the mandates of this Order in a timely manner or be subject to prosecution for practicing dentistry without a license in Texas.

Respondent's signature does not constitute either an admission or denial of the allegations set forth in this Order or the underlying complaint, and by signing this document, Respondent does not admit or deny the findings of fact and the conclusions of law set forth herein.

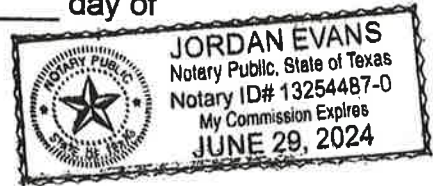
By signing this Order, Respondent waives any right to a formal hearing and any right to judicial review of this Order.

All of the above terms, conditions, and penalties become effective on the effective date of this Order or as otherwise set out herein. The effective date of this Surrender Order shall be the date it is executed by the State Board of Dental Examiners.

Stacey Bartley
Stacey Bartley, RDA, Owner of Mobile Dynamic Dental Services

SWORN TO AND SUBSCRIBED before me on the 22nd day of September, 2021.

[Signature]



NOTARY PUBLIC IN and FOR THE STATE OF TEXAS

WHEREFORE, PREMISES CONSIDERED, the Texas State Board of Dental Examiners does hereby accept the voluntary surrender of Texas Mobile Dental Facility Registration No. M-24456 previously issued to Mobile Dynamic Dental Services.

Effective this 1st day of October, 2021.

Casey Nichols
Casey Nichols
Executive Director
Texas State Board of Dental Examiners

JK

STATE OF TEXAS

COUNTY OF

Bastrop

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EXHIBIT A

**AFFIDAVIT OF VOLUNTARY SURRENDER OF MOBILE DENTAL FACILITY
REGISTRATION**

Before me, the undersigned authority, personally appeared Stacey Bartley, owner of Mobile Dynamic Dental Services issued Texas Mobile Dental Facility Registration No. M-24456, who, being by me duly sworn, deposed as follows:

My name is Stacey Bartley. I am the owner of Mobile Dynamic Dental Services, which holds Texas Mobile Dental Facility Registration No. M-24456. I am over 18 years of age, of sound mind, and I am capable of making this affidavit. I am not under the influence of alcohol or any drugs, have not been coerced, am acting on my own free will, understand that I have the right to discuss this decision with an attorney, and voluntarily agree to sign this Affidavit. Without any threats or promises having been made to me by any agent or employee of the State Board of Dental Examiners, I am signing this document and do voluntarily surrender my Texas Mobile Dental Facility Registration No. M-24456. The effective date of the surrender will be IMMEDIATELY. This surrender is offered in order to resolve SBDE Case No. 2019-00867.

I hereby waive my right to complain or have judicial review of any final order entered by the Texas State Board of Dental Examiners accepting the voluntary surrender of my registration. This affidavit of surrender shall become irrevocable upon delivery to the offices of the Texas State Board of Dental Examiners.

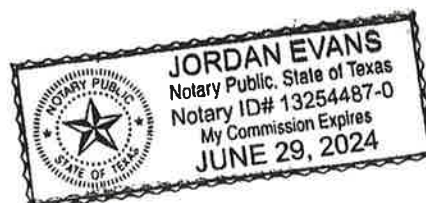
I fully understand that by this surrender, I can no longer operate a mobile dental facility in the State of Texas.

Stacey Bartley

Stacey Bartley, RDA, Owner of Mobile Dynamic Dental Services
Texas Mobile Dental Facility No. M-24456

SWORN TO AND SUBSCRIBED before me on the 2nd day of September, 2021.

[Signature]
Notary Public in and for
The State of Texas



JK